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This comment is in reference to FCC Proceeding 04-405.

Executive Summary : I propose SBC and the other ILEC's be split up into two providers. One that provides the physical wires and the other that provides services to the customers through those wires. All carriers pay the same price for access to the physical wires.

I think there should be two separate companies/organizations created from Bell south. One company manages the physical wires. They concentrate on maintenance and expanding coverage. They should provide no direct service to customers.

The second company provides the "dial tone" and broadband services.

For each geographical area there is a price for access to the wires and necessary equipment connections. This price should be the same for each carrier. The prices increases by the number of simultaneous lines in use. A big carrier like SBC pays the same price (monthly) that a small local carrier does. Then nobody can argue that one provider is subsidizing the other. It makes it a level playing field.

SBC no longer can argue about being forced to "be nice" to their competitors. Also no long has the conflict of interest in fixing problems first for their own customers and later of the third parties.

Now how can we do this in practice?

I admit, I am no congressman but just a concerned citizen.

There seems to me to be two ways the easy way and the hard way.

The hard way is for the government to buy up all of the physical (wiring) assets from SBC (and the other carriers) and the government manages the wires. As could be imagined, this would be very expensive and time consuming. Not recommended.

The easy way is SBC is forced to by law to stop providing direct telephone service to the customer. Then, SBC spins off their "dial tone" and broadband divisions into a new company. In practice, the company is already organized this way with SBC-ASI working on the wires and SBC Yahoo providing broadband (DSL) service. The important thing is they have different management and pay the same rates that everyone else does. It ceritanly would have some inconvenience for SBC but they don't loose many of their existing investments.

Even Further, SBC could argue that its unfair to them. Well, if SBC doesn't want to abide by the laws of this county I'm sure some other company (verizon, Sprint) would be overjoyed to take their place.

The problem is they have a conflict of interest by both services being provided by the same company. It is in the company's interest to have more profits. Its more profitable to provide lower quality service at a higher price. It costs money to purchase more equipment to allow faster internet service.

However, its in the customers (general public) interest to have better connectivity available to them.

Thank you for your time,  
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